



December 20, 2011

Kelly Sisario, Chief
Enforcement and Compliance Planning and Analysis Branch
United States Environmental Protection Agency Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA. 30303-8960

Re: Voluntary Self-Disclosure Docket# 04-2012-9106

Dear Chief Sisario:

This letter is in response to your request for additional information regarding our Voluntary Self-Disclosure Submission dated November 1, 2011.

The date of the change of ownership from LaLa USA to Borden Dairy Company was May 10, 2011.

Should you require any additional information please do not hesitate to contact to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Lasky", written in a cursive style.

Mike Lasky
Borden Dairy Company
308 Ave G SW
Winter Haven, FL. 33880
Ph: (863)-297-7300



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 2 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mike Lasky
Borden Dairy Company
308 Avenue G SW
Winterhaven, Florida 33880

RE: Voluntary Self-Disclosure – Docket No. 04-2012-9106

Dear Mr. Lasky:

The United States Environmental Protection Agency has begun review of your submission dated November 1, 2011, in which you disclosed potential violations under the Clean Air Act. The purpose of this letter is to inform you of our initial review findings and to report on the status of our review of your disclosure.

For consideration under the EPA policy on "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," 65 Fed. Reg. 19618, April 11, 2000 (Audit Policy), a disclosure must address each of the nine Audit Policy conditions and provide violation specific information. Your November 1, 2011, disclosure touched on many of these criteria; however, in order for EPA to continue processing your submission, additional information is necessary. Specifically:

1. The date of change of ownership of the plant from LaLa USA to Borden Dairy Co.
2. The final Risk Management Plan, when available.

After EPA receives your response, we will confirm the specific violations which occurred and determine whether the Audit Policy applies. Our goal is to resolve this matter as expeditiously as possible – for this we will need your cooperation. If a response is not received by December 30, 2011, then your November 1, 2011, disclosure will be considered to have been withdrawn and the review will be terminated.

EPA appreciates your willingness to self-police, disclose, and correct potential violations at your facilities. We will contact you if further clarification is needed. If you have any questions, please feel free to contact Stan Mitchell of my staff at (404) 562-9469 or mitchell.stanley@epa.gov.

Sincerely,

Kelly Sisario, Chief
Enforcement and Compliance Planning
and Analysis Branch



November 1, 2011

Kelly Sisario, Chief
Enforcement and Compliance Planning and Analysis Branch
Office of Environmental Accountability
U.S. EPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

To Whom It May Concern:

Please find enclosed the EPA Audit Policy Disclosure Form that has been completed for the Borden Dairy Company of Florida, LLC – Miami facility.

If you have any questions, please feel free to contact me at (863) 297-7300.

Sincerely,

Mike Lasky
General Manager

/tms



EPA Audit Policy Disclosure Form

September 3, 2008 - Version 8

U.S. EPA Region 6
Audit Policy Disclosure
1445 Ross Avenue (6EN-X)
Suite 1200
Dallas, TX 75202-2733

The information disclosed on this form is voluntary and is submitted in accordance with the EPA Audit Policy, "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations," which can be found at www.epa.gov/compliance/resources/policies/incentives/auditing/auditpolicy51100.pdf. The information you provide will result in EPA opening an enforcement file regarding this Disclosure. This Disclosure is applicable only to those locations in located in Arkansas, Louisiana, Oklahoma, New Mexico, Texas, and the Western portion of the Gulf of Mexico (areas subject to EPA Region 6 jurisdiction).

In the event that EPA needs additional information, you will be contacted electronically at your email address you provided with this Disclosure. Once EPA has reviewed the Disclosure, you will be notified electronically of EPA's decision.

This electronic reporting process is an alternative to the traditional paper Disclosure. This process does not allow for materials that include Confidential Business Information (CBI). If you do not wish to use this process or you have CBI materials in support of your Disclosure, you should mail your Audit Policy Disclosure to the address at the top-right of this form.

Processing ID No.: Your Processing ID assigned via Registration with CDX for the Region 6 eDisclosure Form.

Legal Name: Please provide the complete legal name of the entity this Disclosure relates to. If you are an individual, this will be your full name and may include a "Doing Business As". Please do not abbreviate.

Legal Name:

Please check the box and provide the requested information which best describes the legal status of the Disclosing entity.

☐ An Individual doing business as:

☒ A corporation which was organized under the laws of the State or Tribal Nation of:

☐ A partnership, formed under the laws of the State or Tribal Nation of:

☐ An association doing business in the State or Tribal Nation of:

☐ A municipality, chartered under the laws of the State or Tribal Nation of:

☐ A statutory utility district, chartered under the laws of the State or Tribal Nation of:

☐ A commission chartered under the laws of the State or Tribal Nation of:

☐ A political subdivision of the State or Tribal Nation of:

☐ The United States Government, the department or agency name of which is:

☐ Other:

NAICS Code:



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Please provide the following information about yourself.

Name Prefix: Mr. (e.g., Mr., Mrs., Miss, Dr....) Job Title: General Manager
First Name: Michael Middle Name or Initial:
Last Name: Lasky Suffix: (e.g., Jr., Sr., II, III, IV, Esq., P.E., etc.)
Salutation: (e.g., If you go by "Bob" and your first name is "Robert.")

Mailing Address: 308 Avenue G SW
City: Winter Haven State: FL Zip: 33880
Telephone: 863-297-7300
Email: mlasky@bordendairy.com

☒ Is the individual submitting this self disclosure report authorized by the company to make such a report?

Facility Information*:

Facility Name: Borden Dairy Company of Florida, LLC
Physical Address: 501 NE 181st St.
City: Miami State: FL Zip: 33162
Latitude: 25.942076 Decimal Degrees OR Degrees Minutes Seconds
Longitude: -80.191149 Decimal Degrees OR Degrees Minutes Seconds
Mailing Address: 308 Ave G SW
City: Winter Haven State: FL Zip: 33880
Facility Telephone: 863-297-7300
Facility Email: mlasky@bordendairy.com
Facility Web Page:

* This electronic Self Disclosure is designed to handle only one facility per Disclosure. If you wish to make a Disclosure regarding multiple facilities, you will need to make a separate Disclosure for each facility.



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EPA Program ID Numbers (If known):

FRS:

CAA AFS:

CWA (PCS / NPDES):

RCRA ID No.:

EPCRA 313:

SDWA (PWS No.):

Other:

Please check all applicable environmental statutes with regards to this Disclosure:

☐ Federal Water Pollution Control Act (aka, the Clean Water Act)

☐ Oil Pollution Act

☒ Clean Air Act

☐ Resource Conservation Recovery Act

☐ Comprehensive Environmental Response, Compensation and Liability Act

☐ Pollution Prevention Act of 1990

☐ Toxic Substances Control Act

☐ Safe Drinking Water Act

☐ Federal Insecticide, Fungicide, and Rodenticide Act

☐ Pesticide Registration Improvement Act of 2003

☐ Federal Food, Drug, and Cosmetic Act

☐ Food Quality Protection Act of 1996

☐ Other Law:

☐ Other Law:

N.B.: Emergency Planning and Community Right-to-Know Act Disclosures are not available with this document.

Date of Discovery of the Violation(s):

Date of this Report:

See Condition 3 "Prompt Disclosure", on page 7, (21 day calculation).



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Description of Violation(s): Please describe the violation(s) you are Disclosing.

The facility operates an anhydrous ammonia refrigeration system to maintain food quality standards for the dairy operation. The nominal inventory in the system exceeds the 10,000 pound threshold for Risk Management Program as stated in 40 CFR 68. The facility failed to prepare and submit a Risk Management Program.



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In order to process your Disclosure, the following 9 conditions of the Audit Policy must be addressed. The Audit Policy can be accessed at www.epa.gov/compliance/incentives/auditing/auditpolicy.html

Condition 1: Systematic Discovery of the Violation through an Environmental Audit or a Compliance Management System.

Under Section D(1), the violation must have been discovered through either (a) an environmental audit, or (b) a compliance management system that reflects due diligence in preventing, detecting and correcting violations. Both "environmental audit" and "compliance management system" are defined in Section B of the Policy.

The revised Policy uses the term "compliance management system" instead of "due diligence," which was used in the 1995 Policy. This change in nomenclature is intended solely to conform the Policy language to terminology more commonly in use by industry and by regulators to refer to a systematic management plan or systematic efforts to achieve and maintain compliance. No substantive difference is intended by substituting the term "compliance management system" for "due diligence," as the Policy clearly indicates that the compliance management system must reflect the regulated entity's due diligence in preventing, detecting and correcting violations.

Compliance management programs that train and motivate employees to prevent, detect and correct violations on a daily basis are a valuable complement to periodic auditing. Where the violation is discovered through a compliance management system and not through an audit, the disclosing entity should be prepared to document how its program reflects the due diligence criteria defined in Section B of the Policy statement. These criteria, which are adapted from existing codes of practice—such as Chapter Eight of the U.S. Sentencing Guidelines for organizational defendants, effective since 1991—are flexible enough to accommodate different types and sizes of businesses and other regulated entities. The Agency recognizes that a variety of compliance management programs are feasible, and it will determine whether basic due diligence criteria have been met in deciding whether to grant Audit Policy credit.

As a condition of penalty mitigation, EPA may require that a description of the regulated entity's compliance management system be made publicly available. The Agency believes that the availability of such information will allow the public to judge the adequacy of compliance management systems, lead to enhanced compliance, and foster greater public trust in the integrity of compliance management systems.

☐ Check this box if this Disclosure does not meet Condition 1.

As a result of a change in company ownership, there is concern that the facility was not in compliance with Section 112 (r) of the Clean Air Act Amendments of 1990, specifically Risk Management program requirements. Borden Dairy Company retained a consultant to conduct an audit of the facility's operations and determine compliance with applicable sections of the rule. The audit process was completed October 17, 2011.

The system inventory was obtained on site from equipment data and documentation as well as information from outside vendors and other sources.



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Condition 2: Voluntary Discovery

Under Section D(2), the violation must have been identified voluntarily, and not through a monitoring, sampling, or auditing procedure that is required by statute, regulation, permit, judicial or administrative order, or consent agreement. The Policy provides three specific examples of discovery that would not be voluntary, and therefore would not be eligible for penalty mitigation: emissions violations detected through a required continuous emissions monitor, violations of NPDES discharge limits found through prescribed monitoring, and violations discovered through a compliance audit required to be performed by the terms of a consent order or settlement agreement. The exclusion does not apply to violations that are discovered pursuant to audits that are conducted as part of a comprehensive environmental management system (EMS) required under a settlement agreement. In general, EPA supports the implementation of EMSs that promote compliance, prevent pollution and improve overall environmental performance. Precluding the availability of the Audit Policy for discoveries made through a comprehensive EMS that has been implemented pursuant to a settlement agreement might discourage entities from agreeing to implement such a system.

In some instances, certain Clean Air Act violations discovered, disclosed and corrected by a company prior to issuance of a Title V permit are eligible for penalty mitigation under the Policy. For further guidance in this area, see "Reduced Penalties for Disclosures of Certain Clean Air Act Violations," Memorandum from Eric Schaeffer, Director of the EPA Office of Regulatory Enforcement, dated September 30, 1999. This document is available on the Internet at www.epa.gov/oeca/ore/apolguid.html.

The voluntary requirement applies to discovery only, not reporting. That is, any violation that is voluntarily discovered is generally eligible for Audit Policy credit, regardless of whether reporting of the violation was required after it was found.

The discovery of alleged violations was identified through the voluntary audit process. The audit was not conducted as a result of an agency inspection or order.



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Condition 3: Prompt Disclosure

Section D(3) requires that the entity disclose the violation in writing to EPA within 21 calendar days after discovery. If the 21st day after discovery falls on a weekend or Federal holiday, the disclosure period will be extended to the first business day following the 21st day after discovery. If a statute or regulation requires the entity to report the violation in fewer than 21 days, disclosure must be made within the time limit established by law. (For example, unpermitted releases of hazardous substances must be reported immediately under 42 U.S.C. 9603.) Disclosures under this Policy should be made to the appropriate EPA Regional office or, where multiple Regions are involved, to EPA Headquarters. The Agency will work closely with States as needed to ensure fair and efficient implementation of the Policy. For additional guidance on making disclosures, contact the Audit Policy National Coordinator at EPA Headquarters at 202-564-5123.

The 21-day disclosure period begins when the entity discovers that a violation has, or may have, occurred. The trigger for discovery is when any officer, director, employee or agent of the facility has an objectively reasonable basis for believing that a violation has, or may have, occurred. The "objectively reasonable basis" standard is measured against what a prudent person, having the same information as was available to the individual in question, would have believed. It is not measured against what the individual in question thought was reasonable at the time the situation was encountered. If an entity has some doubt as to the existence of a violation, the recommended course is for the entity to proceed with the disclosure and allow the regulatory authorities to make a definitive determination. Contract personnel who provide on-site services at the facility may be treated as employees or agents for purposes of the Policy.

If the 21-day period has not yet expired and an entity suspects that it will be unable to meet the deadline, the entity should contact the appropriate EPA office in advance to develop disclosure terms acceptable to EPA. For situations in which the 21-day period already has expired, the Agency may accept a late disclosure in the exceptional case, such as where there are complex circumstances, including where EPA determines the violation could not be identified and disclosed within 21 calendar days after discovery.

EPA also may extend the disclosure period when multiple facilities or acquisitions are involved.

In the multi-facility context, EPA will ordinarily extend the 21-day period to allow reasonable time for completion and review of multi-facility audits where: (a) EPA and the entity agree on the timing and scope of the audits prior to their commencement; and (b) the facilities to be audited are identified in advance. In the acquisitions context, EPA will consider extending the prompt disclosure period on a case-by-case basis. The 21-day disclosure period will begin on the date of discovery by the acquiring entity, but in no case will the period begin earlier than the date of acquisition.

In summary, Section D(3) recognizes that it is critical for EPA to receive timely reporting of violations in order to have clear notice of the violations and the opportunity to respond if necessary. Prompt disclosure is also evidence of the regulated entity's good faith in wanting to achieve or return to compliance as soon as possible. The integrity of Federal environmental law depends upon timely and accurate reporting. The public relies on timely and accurate reports from the regulated community, not only to measure compliance but to evaluate health or environmental risk and gauge progress in reducing pollutant loadings. EPA expects the Policy to encourage the kind of vigorous self-policing that will serve these objectives and does not intend that it justify delayed reporting. When violations of reporting requirements are voluntarily discovered, they must be promptly reported. When a failure to report results in imminent and substantial endangerment or serious harm to the environment, Audit Policy credit is precluded under condition D(8).

The facility was purchased by LaLa USA in 2009 and became Borden Dairy Company of Florida, LLC in 2011. The audit findings were completed 10-17-11. This voluntary disclosure is being made on 11-1-11.



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Condition 4: Discovery and Disclosure Independent of Government or Third Party Plaintiff

Under Section D(4), the entity must discover the violation independently. That is, the violation must be discovered and identified before EPA or another government agency likely would have identified the problem either through its own investigative work or from information received through a third party. This condition requires regulated entities to take the initiative to find violations on their own and disclose them promptly instead of waiting for an indication of a pending enforcement action or third-party complaint.

Section D(4)(a) lists the circumstances under which discovery and disclosure will not be considered independent. For example, a disclosure will not be independent where EPA is already investigating the facility in question. However, under subsection (a), where the entity does not know that EPA has commenced a civil investigation and proceeds in good faith to make a disclosure under the Audit Policy, EPA may, in its discretion, provide penalty mitigation under the Audit Policy. The subsection (a) exception applies only to civil investigations; it does not apply in the criminal context. Other examples of situations in which a discovery is not considered independent are where a citizens' group has provided notice of its intent to sue, where a third party has already filed a complaint, where a whistleblower has reported the potential violation to government authorities, or where discovery of the violation by the government was imminent. Condition D(4)(c)—the filing of a complaint by a third party—covers formal judicial and administrative complaints as well as informal complaints, such as a letter from a citizens' group alerting EPA to a potential environmental violation.

Regulated entities that own or operate multiple facilities are subject to section D(4)(b) in addition to D(4)(a). EPA encourages multi-facility auditing and does not intend for the "independent discovery" condition to preclude availability of the Audit Policy when multiple facilities are involved. Thus, if a regulated entity owns or operates multiple facilities, the fact that one of its facilities is the subject of an investigation, inspection, information request or third-party complaint does not automatically preclude the Agency from granting Audit Policy credit for disclosures of violations self-discovered at the other facilities, assuming all other Audit Policy conditions are met. However, just as in the single-facility context, where a facility is already the subject of a government inspection, investigation or information request (including a broad information request that covers multiple facilities), it will generally not be eligible for Audit Policy credit. The Audit Policy is designed to encourage regulated entities to disclose violations before any of their facilities are under investigation, not after EPA discovers violations at one facility. Nevertheless, the Agency retains its full discretion under the Audit Policy to grant penalty waivers or reductions for good-faith disclosures made in the multi-facility context. EPA has worked closely with a number of entities that have received Audit Policy credit for multi-facility disclosures, and entities contemplating multi-facility auditing are encouraged to contact the Agency with any questions concerning Audit Policy availability.

The audit was conducted and disclosure of the violation was made independent of any governmental action, notification of inspection, or third party complaint.



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Condition 5: Correction and Remediation

Under Section D(5), the entity must remedy any harm caused by the violation and expeditiously certify in writing to appropriate Federal, State, and local authorities that it has corrected the violation. Correction and remediation in this context include responding to spills and carrying out any removal or remedial actions required by law. The certification requirement enables EPA to ensure that the regulated entity will be publicly accountable for its commitments through binding written agreements, orders or consent decrees where necessary.

Under the Policy, the entity must correct the violation within 60 calendar days from the date of discovery, or as expeditiously as possible. EPA recognizes that some violations can and should be corrected immediately, while others may take longer than 60 days to correct. For example, more time may be required if capital expenditures are involved or if technological issues are a factor. If more than 60 days will be required, the disclosing entity must so notify the Agency in writing prior to the conclusion of the 60-day period. In all cases, the regulated entity will be expected to do its utmost to achieve or return to compliance as expeditiously as possible.

If correction of the violation depends upon issuance of a permit that has been applied for but not issued by Federal or State authorities, the Agency will, where appropriate, make reasonable efforts to secure timely review of the permit.

The facility is in the process of completing a Process Safety Management and Risk Management Program in order to achieve compliance with applicable regulations. The facility will make a Risk Management Program submittal no later than 90 days after discovery due to the upcoming holidays.

Condition 6: Prevent Recurrence

Under Section D(6), the regulated entity must agree to take steps to prevent a recurrence of the violation after it has been disclosed. Preventive steps may include, but are not limited to, improvements to the entity's environmental auditing efforts or compliance management system.

The facility shall develop and implement a Process Safety Management and Risk Management Program for its anhydrous ammonia refrigeration system in accordance with the requirements set forth in 29 CFR 1910.119 and 40 CFR 68. These programs are intended to prevent recurrence of the disclosed violation.



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Condition 7: No Repeat Violations

Condition D(7) bars repeat offenders from receiving Audit Policy credit. Under the repeat violations exclusion, the same or a closely-related violation must not have occurred at the same facility within the past 3 years. The 3-year period begins to run when the government or a third party has given the violator notice of a specific violation, without regard to when the original violation cited in the notice actually occurred. Examples of notice include a complaint, consent order, notice of violation, receipt of an inspection report, citizen suit, or receipt of penalty mitigation through a compliance assistance or incentive project.

When the facility is part of a multi-facility organization, Audit Policy relief is not available if the same or a closely-related violation occurred as part of a pattern of violations at one or more of these facilities within the past 5 years. If a facility has been newly acquired, the existence of a violation prior to acquisition does not trigger the repeat violations exclusion.

The term "violation" includes any violation subject to a Federal, State or local civil judicial or administrative order, consent agreement, conviction or plea agreement. Recognizing that minor violations sometimes are settled without a formal action in court, the term also covers any act or omission for which the regulated entity has received a penalty reduction in the past. This condition covers situations in which the regulated entity has had clear notice of its noncompliance and an opportunity to correct the problem.

The repeat violation exclusion benefits both the public and law-abiding entities by ensuring that penalties are not waived for those entities that have previously been notified of violations and fail to prevent repeat violations. The 3-year and 5-year "bright lines" in the exclusion are designed to provide regulated entities with clear notice about when the Policy will be available.

The disclosed violation has not occurred at the facility in the past three years.

Condition 8: Other Violations Excluded

Section D(8) provides that Policy benefits are not available for certain types of violations. Subsection D(8)(a) excludes violations that result in serious actual harm to the environment or which may have presented an imminent and substantial endangerment to public health or the environment. When events of such a consequential nature occur, violators are ineligible for penalty relief and other incentives under the Audit Policy. However, this condition does not bar an entity from qualifying for Audit Policy relief solely because the violation involves release of a pollutant to the environment, as such releases do not necessarily result in serious actual harm or an imminent and substantial endangerment. To date, EPA has not invoked the serious actual harm or the imminent and substantial endangerment clauses to deny Audit Policy credit for any disclosure.

Subsection D(8)(b) excludes violations of the specific terms of any order, consent agreement, or plea agreement. Once a consent agreement has been negotiated, there is little incentive to comply if there are no sanctions for violating its specific requirements. The exclusion in this section also applies to violations of the terms of any response, removal or remedial action covered by a written agreement.

This disclosed violation did not result in actual harm or the imminent threat of endangerment or harm to human health or the environment. The disclosed violation does not violate the term of any order, consent agreement or plea bargain. No such document exists for the facility.



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Condition 9: Cooperation

Under Section D(9), the regulated entity must cooperate as required by EPA and provide the Agency with the information it needs to determine Policy applicability. The entity must not hide, destroy or tamper with possible evidence following discovery of potential environmental violations. In order for the Agency to apply the Policy fairly, it must have sufficient information to determine whether its conditions are satisfied in each individual case. In general, EPA requests audit reports to determine the applicability of this Policy only where the information contained in the audit report is not readily available elsewhere and where EPA decides that the information is necessary to determine whether the terms and conditions of the Policy have been met. In the rare instance where an EPA Regional office seeks to obtain an audit report because it is otherwise unable to determine whether Policy conditions have been met, the Regional office will notify the Office of Regulatory Enforcement at EPA headquarters.

Entities that disclose potential criminal violations may expect a more thorough review by the Agency. In criminal cases, entities will be expected to provide, at a minimum, the following: access to all requested documents; access to all employees of the disclosing entity; assistance in investigating the violation, any noncompliance problems related to the disclosure, and any environmental consequences related to the violations; access to all information relevant to the violations disclosed, including that portion of the environmental audit report or documentation from the compliance management system that revealed the violation; and access to the individuals who conducted the audit or review.

Upon notification of the alleged violation by the consultant, Borden Dairy Company of Florida, LLC directed the consultant to begin preparation of a PSM and RMP program for the facility.



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Cost of Non-Compliance: This policy allows for either the elimination of the gravity portion of a penalty or a reduction of up to 75% if all but the first condition is met. However, it is the policy of EPA to collect the cost of non-compliance. This policy does not require that the Discloser provide a financial analysis of the economic benefit. However, if one is not provided, EPA will use its own best professional judgment to determine the value of economic benefit, if any. The EPA financial models used to determine economic benefit can be found at www.epa.gov/compliance/civil/econmodels/

Cost of Non-Compliance (US Dollars):

Rationale behind the Cost of Non-Compliance amount:

Sensus Year: 2010

Duration of Violation 2010-2011

Gross Annual Sales for the Period of Violation: \$105,000,000.00

Facility Employees: 115

Ammonia was present at the facility in an amount <10 times the reporting threshold.



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Pollutant Reductions: Please provide an estimate of the pollutant reductions achieved as a result of steps taken in response to findings in the environmental audit behind this Self Disclosure. List the pollutant parameter(s) (e.g., chemical oxygen demand, carbon monoxide, lead, arsenic, etc.) and the pounds of pollutants reduced, where appropriate (some pollutants such as temperature, fecal coliforms or pH are not measured in mass units and you should simply report the pollutant name). If pollutant reductions are a function of time (e.g., reduced flow and thereby reduced pollutants), please calculate the pollutant reductions for one year of operation.

Pollutant Name

Pounds Reduced

Not Applicable

Anhydrous ammonia is used as a process refrigerant.